

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

LETICIA L. RIVAS,

Plaintiff,

v.

HOLIDAY FINANCE CORPORATION,

Defendant.

Case No. 7:21-cv-00455

**MOTION FOR EXTENSION OF TIME TO FILE DISMISSAL PAPERS AND TO
CANCEL THE INITIAL STATUS CONFERENCE SCHEDULED
FOR FEBRUARY 10, 2022**

NOW COMES LETICIA L. RIVAS (“Plaintiff”), by and through her undersigned attorney, moving this Honorable Court for an extension of time to file dismissal papers and canceling the initial status conference, and in support thereof, stating as follows:

1. Plaintiff filed her complaint against Defendant on November 29, 2021. [Dkt. 1].
2. On November 29, 2021 this honorable court set an Initial Conference for February 10, 2022 on this matter. [Dkt. 8].
3. The parties in this case have reached a settlement.
4. On February 9, 2022 Plaintiff filed a Notice of Settlement with the Court. [Dkt. 15]
5. The settlement has not been consummated to date.
6. Specifically, Plaintiff and Defendant are in the process of satisfying their obligations under the terms of the prospective agreement.
7. Accordingly, Plaintiff is respectfully requesting an additional 60 days, through April 11, 2022 to consummate the settlement and file dismissal papers.

8. Furthermore, Plaintiff is requesting that this honorable court cancel the initial status conference scheduled for today (February 10, 2022).

9. Plaintiff's request to cancel the initial status conference is requested in good faith in order to keep fees and costs at a minimum in this matter as the parties have reached a settlement.

WHEREFORE, Plaintiff respectfully requests the Court to enter an order extending the deadline to file dismissal papers to April 11, 2022, canceling the initial status conference scheduled for February 10, 2022 and grant such other relief as the Court deems appropriate.

Dated: February 10, 2022

Respectfully submitted,

/s/ Victor T. Metroff
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CERTIFICATE OF SERVICE

I, Victor T. Metroff, certify that on February 10, 2022, the foregoing document was filed electronically using the Court's CM/ECF system, which will accomplish service on all counsel of record.

/s/ Victor T. Metroff